

# SEEGERWEISS LLP

May 17, 2018

**Via ECF**

Honorable Anita B. Brody  
United States District Judge  
Eastern District of Pennsylvania  
601 Market Street  
Room 7613  
Philadelphia, PA 19106

Re: *In re National Football League Players' Concussion Injury Litigation*,  
No. 12-md-2323-AB

Dear Judge Brody:

I respectfully submit this letter to briefly respond to the post-hearing letter filed yesterday by counsel for the Faneca Objectors (ECF No. 9995).

As an initial matter, I note that the Court neither solicited nor authorized post-hearing submissions. In any event, Mr. Molo's letter provides nothing in addition to what he previously argued in support of his cross-petition for a fee award. For Co-Lead Class Counsel's detailed arguments as to why the Faneca Objectors' sundry filings and arguments did not benefit the Class, I respectfully refer the Court to pages 38-56 of the April 10, 2017 reply brief filed in further support of the common benefit fee petition (ECF No. 7464, at 49-67); page 13 (at ¶ 16) of my October 10, 2017 Declaration (ECF No. 8447, at 13); and pages 43-44 (at ¶ 109) of my November 11, 2017 Reply Declaration (ECF No. 8934, at 43-44). For those reasons, the Court should not award the Faneca Objectors common benefit fees in excess of my recommended allocation of \$150,000 in recognition of their work in coordinating the presentation of objections at the November 2014 Fairness Hearing.

Respectfully,

/s/ Christopher A. Seeger  
Christopher A. Seeger  
Co-Lead Class Counsel

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: May 17, 2018

/s/ Christopher A. Seeger  
Christopher A. Seeger